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 Plaintiff in Pro Per

THE UNITED STATES DISTRICT COURT  
 FOR NORTHERN CALIFORNIA

	)	Case No. 3:18-cv-03748-JCS
Tatyana E. Drevaleva	)	
<i>Plaintiff,</i>	)	Additional Information to my
vs.	)	Administrative Motion for an Order that
	)	Disqualifies the Hon. Judge Joseph C.
Mr. Denis Richard McDonough in his	)	Spero from judging all my lawsuits;
capacity as a Secretary of the U.S.	)	the Civil Local Rule 7-11.
Department of Veterans Affairs	)	
810 Vermont Avenue, NW,	)	Location: Courtroom F – 15th Floor
Washington, D.C. 20420	)	450 Golden Gate Avenue,
<i>Defendant</i>	)	San Francisco, CA 94102
Facility:	)	Judge: The Hon. Chief Magistrate
New Mexico VA Healthcare System	)	Judge Joseph C. Spero
1501 San Pedro Drive, S.E.	)	
Albuquerque, NM, 87108	)	
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1 Plaintiff-Appellant Tatyana Drevaeva is submitting Additional Information to my April  
2 30, 2021 Administrative Motion for an Order that immediately and permanently disqualifies the  
3 Hon. Judge Joseph C. Spero from judging all my lawsuits against the U.S. Department of  
4 Veterans Affairs.

5 On March 20, 2021, I filed an Administrative Motion for an Order that immediately  
6 disqualifies Attorney Robinson from representing the U.S. Department of Veterans Affairs in my  
7 lawsuits (Doc. No. 326.) I explained that Robinson had intentionally and maliciously used  
8 dilatory tactics in all my five lawsuits. I also explained that I suspected that the alleged  
9 Declaration of Carla Dunkelberger (Doc. No. 50-1 and 50-2) could have possibly been a  
10 fabricated piece of evidence. On March 22, 2021, the Hon. Judge Haywood S. Gilliam denied  
11 my Administrative Motion and kept Robinson in my lawsuits (Doc. No. 328.)

12 On April 05, 2021, I filed the Second Administrative Motion for an Order that  
13 disqualifies Robinson from representing the U.S. Department of Veterans Affairs (Doc. No.  
14 347.) I explained to the Hon. Judge Joseph Spero that Robinson was a criminal, that she  
15 intentionally and maliciously harmed me during the litigations of my lawsuits, and I suspected  
16 that the alleged Declaration of Carla Dunkelberger (Doc. No. 50-1 and 50-2) was a fabricated  
17 piece of evidence, and I suspected that Ms. Dunkelberger *herself* could have not possibly  
18 redacted the Exhibits to this Declaration. On April 05, 2021, the Hon. Judge Joseph Spero denied  
19 my Administrative Motion, refused to disqualify Robinson from representing the U.S.  
20 Department of Veterans Affairs, and prohibited me to file more Motions before the April 30,  
21 2021 Case Management Conference (Doc. No. 349.)

22 On April 11, 2021, I filed a Request for Permission to File a Third Administrative Motion  
23 for an Order that Immediately Disqualifies Attorney Ms. Kimberly Robinson from Participating  
24 in the April 30, 2021 Case Management Conference, that Prohibits Robinson to File a Case  
25 Management Statement, and that Directs the U.S. Department of Justice to Appoint Another  
26 Lawyer for Representing the U.S. Department of Veterans Affairs in My Lawsuits. I explained  
27 that Robinson has criminally, consistently and maliciously used the dilatory tactics that were  
28 aimed to mislead the Court and to delay a fair resolution of all my lawsuits (Doc. No. 352.) I

1 explained that, pursuant to 38 CFR § 18b.15, the Court has a mandatory obligation to remove the  
2 Attorney who uses dilatory tactics. On April 12, 2021, Spero denied my request and kept  
3 Robinson in my case.

4 On April 30, 2021, during the Case Management Conference, I specifically stated that  
5 Robinson was a criminal, that she severely harmed me throughout all litigations, and I asked  
6 Spero to remove Robinson from representing the U.S. Department of Veterans Affairs. Spero  
7 denied my requests, and he kept Robinson in my lawsuits.

8 During the April 30, 2021 Case Management Conference, Spero specifically asked  
9 Robinson how she is going to respond to my related lawsuits No. 3:21-cv-00500-JCS and 3:21-  
10 cv-00684-JCS.

11 On April 30, 2021, Spero denied my request to appoint a Counsel (Doc. No. 368)  
12 asserting that “The Court has limited resources to appoint counsel in civil cases, and is not  
13 persuaded that this case warrants appointment of counsel at this time.” However, during the  
14 April 30, 2021 Case Management Conference, Spero announced that the Parties are welcome to  
15 conduct Discovery. How in the World can I conduct Discovery if I am in California and all  
16 witnesses are in New Mexico?

17 Spero didn’t care that it would be impossible for me to conduct Discovery from the State  
18 of California, and that I wouldn’t be able to depose witnesses who reside in New Mexico.

19 On April 30, 2021, Spero announced about his intention to allow Robinson to file a  
20 Motion for Summary Judgment. Spero didn’t care that on November 18, 2020 the 9<sup>th</sup> Circuit  
21 **already** held that **I was entitled to Summary Judgment for my Title VII claim and for my**  
22 **Rehabilitation Act claim**. Therefore, regardless of what Robinson writes in her possible Motion  
23 for Summary Judgment, this Motion will be frivolous and will be denied. However, Spero  
24 doesn’t care. Spero’s intention is only to continue the best traditions of torturing and humiliating  
25 me as both Alsup and Robinson did. Spero doesn’t care that I urgently need Preliminary  
26 Injunction, and he is indifferent to the fact that currently I can’t obtain a treatment of my  
27 disability.  
28

1 Spero only wants to unnecessary severely delay affair and speedy resolution of my  
2 lawsuit No. 3:18-cv-03748-JCS.

3 I believe that Spero doesn't want to appoint a Counsel to assist me to litigate my lawsuits  
4 for the following reasons:

- 5 1) To hide the fact that the alleged Declaration of Carla Dunkelberger could possibly be  
6 a fabricated piece of evidence
- 7 2) To prevent me from the opportunity to depose witnesses who reside in New Mexico
- 8 3) To compel me to spend an enormous amount of time litigating my lawsuit myself.  
9 Spero doesn't care that, while I am litigating my lawsuits, I can't study, I can't get a  
10 better paid job, I can't earn money, and I can't achieve my goals. Spero only wants to  
11 defend the Federal Government at all costs no matter what facts of the case are and no  
12 matter what the 9<sup>th</sup> Circuit already said about my Appeal No. 19-16395
- 13 4) To allow Robinson to continue her criminal dilatory tactics that are aimed to harm me  
14 and to delay a fair resolution of my lawsuits.

15  
16 I got very much disappointed with the Hon. Judge Joseph Spero. He might have been  
17 good for other litigants. While I admire the testimonies about the Hon. Judge Joseph Spero in  
18 The Robing Room, and while I **really** wanted Judge Spero to be my Judge, I got very much  
19 disappointed with Spero's rulings in my lawsuit No. 3:18-cv-03748-JCS.

20 I don't believe that Judge Spero is fair to me. I believe that he wants to intentionally and  
21 maliciously delay a fair resolution of my lawsuit, to prevent me from conducting Discovery, and  
22 to find a way to grant Robinson's Motion for Summary Judgment.

23 For the reasons stated above, I am respectfully asking the U.S. District Court for the  
24 Northern District of California to disqualify the Hon. Judge Joseph Spero from judging my  
25 lawsuits against the U.S. Department of Veterans Affairs.

26  
27 I declare under the penalty of perjury and under the Federal laws that all foregoing is true  
28 and correct. Executed at San Francisco, CA on May 01, 2021.

1 Respectfully submitted,

2  
3 s/ Tatyana Drevaleva



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5 Plaintiff Pro Se

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7 May 01, 2021.  
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